

REMARKS/ARGUMENTS

The rejections presented in the Office Action dated November 16, 2007 (hereinafter Office Action) have been considered, and reconsideration of the pending claims and allowance of the application in view of the present response is respectfully requested.

With respect to the objection to Claim 30, the claim has been amended in accordance with the Examiner's suggestion. Therefore, the objection is believed to be overcome, and Applicant requests that the objection be removed.

With respect to the § 112 rejection of Claims 1-3, 5, 6, 8-14, 16, 18-23 and 34-44, the independent claims have been amended to remove the objected-to language. In response to the inquiry as to how the predetermined limitations are taken into account, it is noted that the claims are directed to the virtual identifier being used while taking into account the predetermined limitations. Paragraph [0027] of the Specification describes examples of predetermined limitations and how such predetermined limitations would affect the use of a virtual identifier. Thus, Applicant submits that each of Claims 1-3, 5, 6, 8-14, 16, 18-23 and 34-44 clearly point out the subject matter claimed and requests that the rejection be withdrawn.

With further respect to the § 112 rejection of Claims 5 and 23, the word "first" has been removed from the claims to provide explicit antecedent basis for the objected-to term. Applicant accordingly requests that the rejection be withdrawn.

Without acquiescing to characterizations of the asserted art, Applicant's claimed subject matter, or to the applications of the asserted art or combinations thereof to Applicant's claimed subject matter and in an effort to facilitate prosecution, Applicant has amended the independent claims to indicate that a user equipment requests a virtual identifier or that the virtual identifier consists of numbers such that a portion of the numbers indicate that the virtual identifier is a virtual identifier. Support for these changes may be found in the instant Specification, for example, at paragraphs [0025] and [0028]; therefore, the changes do not introduce new matter. The pending claims are believed to be patentable over the asserted references for the reasons set forth below.

The asserted combination of references (Otto, Stolfo, and Junda) does not teach a device requesting a virtual identifier as now claimed in independent Claims 1, 15 and 21. For example, while Otto teaches that a client computer may request an anonymous, encrypted connection (paragraph [0045]) with the network, the client computer does not request a virtual identifier as claimed. Also, the encrypted connection to the network does not correspond to the claimed use of the virtual identifier for communication with a second user equipment. Moreover, Stolfo fails to teach such limitations since requested proxy information is used for communication between a proxy computer and second parties, and Junda fails to teach such limitations since requested proxy information is not used for communication. None of the asserted references teaches requesting and using a virtual identifier as now claimed.

In addition, the asserted combination of references fails to teach a virtual identifier consisting at least partly of numbers where at least a portion of the numbers identify the virtual identifier as a virtual identifier, as now claimed in Claims 30, 31, 34 and 36. For example, there is no indication that the proxy account numbers of Otto or Junda are generated to match other proxy account numbers or to be identifiable as proxy accounts. Also, there is no suggestion in Stolfo that the proxy IP address is arranged to be identifiable as a proxy address. As the asserted references do not teach the above-discussed limitations, any combination thereof must also fail to teach such limitations. Without correspondence to each of the claimed limitations, each of the § 103(a) rejections would be improper. Applicant accordingly requests that the rejections be withdrawn.

With respect to the rejections of various dependent claims, the further reliance on the teachings of WO 00/12364 to Lumme *et al.* (hereinafter "Lumme") and U.S. Patent No. 6,968,385 to Gilbert (hereinafter "Gilbert") does not appear to overcome the above-discussed deficiencies in the teachings of Otto, Stolfo, and Junda. Neither Lumme nor Gilbert appears to teach a user equipment requesting a virtual identifier or that the virtual identifier consists of numbers such that a portion of the numbers indicate that the virtual identifier is a virtual identifier. As neither Lumme nor Gilbert teaches or suggests these claim limitations, any combination of these teachings with those of Otto, Stolfo, and Junda

must also fail to teach such limitations. Thus, the § 103(a) rejection of dependent Claims 9, 23, 27, 33 and 35 should also not be maintained. Applicant accordingly requests that the rejections be withdrawn.

With particular respect to Claim 36, the rejection should not be maintained for the reasons set forth above in connection with the asserted combination of Otto, Stolfo, and Junda. For example, none of the asserted references appear to teach virtual identifiers consisting at least partly of numbers where at least a portion of the numbers of each virtual identifier is the same, as now claimed. Moreover, the passwords of Gilbert are not disclosed as consisting of numbers or that the issued passwords each have a matching portion of numbers. Thus, the asserted combination of references does not teach or suggest each of the limitations of Claim 36, and Applicant requests that the rejection be withdrawn.

With particular respect to independent Claim 34, Applicant again notes that this claim is not included in any of the statements of rejection. MPEP § 707.07(d) indicates that where a claim is refused the word “reject” must be used and the statutory basis for any ground of rejection should be designated by an express reference in the opening sentence of each ground of rejection. While it appears that the Examiner intended to reject Claim 34 upon the same basis of the rejection of Claims 1-3, 5, 8, 10-16, 18-22, 30, 31 and 37-52, such a rejection would be improper for the reasons discussed above in connection with the failure of the asserted combination of Otto, Stolfo and Junda to correspond to the claimed invention. If this was not the Examiner’s intention, Applicant requests clarification, an opportunity to respond, and that any future rejections comply with MPEP § 707.07(d).

It should be noted that Applicant does not acquiesce to the Examiner’s statements or conclusions concerning what would have been obvious to one of ordinary skill in the art, obvious design choices, non-functional limitations, intended use, common knowledge at the time of Applicant’s invention, officially noticed facts, and the like. Applicant reserves the right to address in detail the Examiner’s characterizations, conclusions, and rejections in future prosecution.

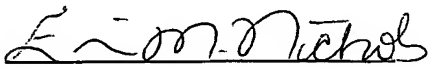
Authorization is given to charge Deposit Account No. 50-3581 (KOLS.055PA) any necessary fees for this filing. If the Examiner believes it necessary or helpful, the

undersigned attorney of record invites the Examiner to contact the undersigned attorney to discuss any issues related to this case.

Respectfully submitted,

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